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Attorney for Defendant
ANTHONY ALEXANDER BASSO

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:22-cr-00248-DJC-1
)	
Plaintiff,)	STIPULATION AND ORDER TO CONTINUE
)	STATUS CONFERENCE AND EXCLUDE
vs.)	TIME
)	
ANTHONY ALEXANDER BASSO,)	Date: November 16, 2023
)	Time: 9:00 a.m.
Defendant.)	Judge: Daniel J. Calabretta
)	
_____)	

IT IS HEREBY STIPULATED by and between Phillip A, Talbert, United States Attorney, through Assistant United States Attorney James Conolly, attorney for Plaintiff and Federal Defender Heather E. Williams through Assistant Federal Defender Douglas Beevers, attorney for Anthony Alexander Basso, that the status conference, currently scheduled for November 16, 2023, be continued to December 7, 2023 at 9:00 a.m.

Defense counsel requests additional time to review discovery and conduct investigation in this case. The parties anticipate an initial plea offer from the government prior to the next status conference, and will require additional time to review the offer with the defendant and respond to the government. The parties believe a continuance to December 7, 2023, will permit defense counsel the additional time necessary to conduct pretrial investigation, identify and interview witnesses, obtain pertinent records, and finalize any further pre-plea negotiations.

Based upon the foregoing, the parties agree time under the Speedy Trial Act should be excluded of this order's date through and including December 7, 2023; pursuant to 18 U.S.C. §3161 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479, Local Code T4

1 based upon continuity of counsel and defense preparation.

2 Counsel and the defendant also agree that the ends of justice served by the Court granting
3 this continuance outweigh the best interests of the public and the defendant in a speedy trial.

4
5 Respectfully submitted,

6 Dated: November 13, 2023

7 HEATHER E. WILLIAMS
8 Federal Defender

9 /s/ Douglas Beevers
10 DOUGLAS BEEVERS
11 Assistant Federal Defender
Attorney for Defendant
ANTHONY ALEXANDER BASSO

12 Dated: November 13, 2023

13 PHILLIP A. TALBERT
United States Attorney

14 /s/ James Conolly
15 JAMES CONOLLY
16 Assistant U.S. Attorney
Attorney for Plaintiff

ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date the parties stipulated, up to and including December 7, 2023, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the November 16, 2023 status conference shall be continued until December 7, 2023, at 9:00 a.m.

Dated: November 14, 2023

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE